

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	NOLLE PROSEQUI
- v. -	:	
	:	12 Cr. 830 (PKC)
ALIREZA MOAZAMI GOUDARZI,	:	
a/k/a "Mikel Scofield,"	:	
a/k/a "Saeed Ebrahimi,"	:	
a/k/a "Sebastian Wilson,"	:	
a/k/a "Richard Bocher,"	:	
a/k/a "Mike Brown,"	:	
	:	
Defendant.	:	
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1. The filing of this *nolle prosequi* is intended to dismiss without prejudice the charges filed against defendant Alireza Moazami Goudarzi, a/k/a "Mikel Scofield," a/k/a "Saeed Ebrahimi," a/k/a "Sebastian Wilson," a/k/a "Richard Bocher," a/k/a "Mike Brown" ("Goudarzi") in this case.

2. On November 14, 2012, Goudarzi was charged in Indictment 12 Cr. 830 (PKC) in six counts (1) from in or about October 2010 to October 24, 2012, conspiracy to violate the International Emergency Economic Powers Act, Title 50, United States Code, Sections 1701 to 1707 ("IEEPA"), and Title 31, Code of Federal Regulations, Sections 560.203 and 560.204, in violation of Title 50, United States Code, Section 1705; (2) from in or about October 2010 to October 24, 2012, conspiracy to violate Title 22, United States Code, Sections 2778(b)(2) and (c), and Title 22, Code of Federal Regulations, Sections 120.17 and 121.1, in violation of Title 18, United States Code, Section 371; (3) from in or about August 2012 to October 24, 2012, attempt to violate Title 22, United States Code, Sections 2778(b)(2) and (c), and Title 22, Code of Federal Regulations, Sections 120.17 and 121.1; (4) from in or about October 2010 to October 24, 2012,

conspiracy to commit money laundering, in violation of Title 18, United States Code, Section 1956(h); (5) on or about February 2, 2011, commission of money laundering, in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2; and (6) on or about September 5, 2011, commission of money laundering, in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and 2.

3. Based on significant foreign policy interests, the United States moves to dismiss without prejudice the charges in Indictment 12 Cr. 830 (PKC) against Goudarzi.

4. In light of the forgoing, the Government recommends that an order of *nolle prosequi* be filed as to Goudarzi with respect to Indictment 12 Cr. 830 (PKC).

/s/ John P. Cronan
John P. Cronan
Assistant United States Attorney
(212) 637-2779

Dated: New York, New York
January 16, 2016

Upon the foregoing recommendation, I hereby direct, with leave of the Court, that an order of *nolle prosequi* be filed as to defendant Alireza Moazami Goudarzi, a/k/a “Mikel Scofield,” a/k/a “Saaed Ebrahimi,” a/k/a “Sebastian Wilson,” a/k/a “Richard Bocher,” a/k/a “Mike Brown,” with respect to Indictment 12 Cr. 830 (PKC).

/s/ Preet Bharara
PREET BHARARA
United States Attorney
Southern District of New York

Dated: New York, New York
January 16, 2016

SO ORDERED:

HONORABLE P. KEVIN CASTEL
United States District Judge
Southern District of New York

Dated: New York, New York
January __, 2016